

CAPTION

FORM 68-J

FIRST INTERROGATORIES IN DISSOLUTION TO _____

Comes now the _____ and propounds the following interrogatories to be answered by _____ in the manner provided by Supreme Court Rule 57.01 & Local Rule 68.

These interrogatories and request for production of documents are of a *continuing nature, requiring you to serve timely supplemental answers* setting forth any information, within the scope of these interrogatories, which may be acquired by you, your attorneys, investigators, agents, or others employed by or acting in your behalf, following the original answers.

INSTRUCTIONS

Type your answers to the following interrogatories in the space provided on this form where possible. If the space provided is not sufficient to completely answer each interrogatory, type your answer on a separate sheet of paper and attach same as an appendix hereto noting on this form which appendix contains your answer to said interrogatory and noting on the appendix reference to the interrogatory being answered.

1. State your full name, date of your birth, the address of your *present place of residence* and your social security number.

ANSWER:

2. State the name and relationship to you of each person residing with you at your present address.

ANSWER:

3. State the address of all previous residences where you have resided for the last year, and the dates you resided at each such address, and the name and relationship to you of each person residing with you at each of your previous addresses.

ANSWER:

4. State the name and address of every person, firm, or corporation by whom you were employed for the past three (3) years and the total gross income per year received from each employer.

ANSWER:

5. Regarding your present employment, please state:
- a. The name, address and phone number of your current employer.
 - b. Your Social Security Number.
 - c. Your job title and a short description of your duties.
 - d. The length of time you have been employed by such employer.
 - e. Your average gross income and take home pay over the last 6 months and the amount of average deductions therefrom.
 - f. The average amount of overtime per month you have received over the past 12 months.
 - g. The hours and days of the week you normally work.
 - h. The name of your immediate supervisor
 - i. The date you were first employed.
 - j. Your rate and unit of pay.
 - k. Identify your bonuses during the past two years and when received.

ANSWER:

6. If you receive any economic (fringe) benefits from your present employment other than wages (i.e. company car, health, or life insurance, expense accounts, club membership, etc.), describe each benefit you receive and the amount you receive from said benefit or the value of said benefit.

ANSWER:

7. If you were self-employed or a member of a partnership during any of the three (3) preceding years, state the nature of the business and your share of the gross income (after business expenses) received in *each* said year.

ANSWER:

8. If you have any interest in any pension, profit sharing, retirement, Keogh Plan, I.R.A. account, thrift plan, or any other form of employment-related asset with any past or present employer, state:

- a. The date first acquired;
- b. The type of asset (e.g. pension plan);
- c. The present vested or cash value to you of such asset;
- d. The name of the company that administers the plan or program and the name, address and phone number of the person who administers the plan;

ANSWER:

9. If you or a member of your household receives *any* pension, dividend, interest, note, insurance, annuity payment, or social security payments on a regular basis, state the type of payment, amount, and the date you normally receive such payment.

ANSWER:

10. Do you own all or any part of any savings account, certificates of deposit, or savings certificates, regardless of where the same is kept, and regardless of whether your name appears alone or not at all or in company with others upon said account within the last two years. If yes, give name and address of each bank or other institution where you maintain each of said accounts, when opened, the balance therein and the interest claimed by you. Also, identify any certificates by number, date purchased, face amount, institution where purchased, and present location.

ANSWER:

11. Do you own all or any part of any checking accounts, regardless of where the same are kept and regardless of whether your name appears alone or not at all or in company with others, individuals or corporate, upon said account within the last two years? If yes, give the name and address of each bank or other institutions where said accounts are maintained, when opened, and balance therein, and the interest claimed by you.

ANSWER:

12. List in detail, by banks and amounts, any and all checking or savings accounts in which you claim no interest, but upon which you alone or in company with another or others have a right to make withdrawals within the last two years. List each such account by name and address of bank, balance on hand and in whose names said accounts are carried.

ANSWER:

13. If you have any claim or cause of action against anyone else, set out in detail the reason for such claim or cause of action and sufficient information to identify any court proceedings pending regarding said claim.

ANSWER:

14. If you have transferred any real or personal property within the last twenty-four (24) months, for each such item, state:

- (a) Legal description of the property;
- (b) The value of your equity interest in the property;
- (c) The date you transferred the property;
- (d) The name and address of the person to whom you transferred said property;
- (e) Net proceeds received for said property.

ANSWER:

15. Do you claim marital misconduct on the part of your spouse? Yes () No ()

If your answer to Question #15 was “No” skip Question #16.

16. If you intend to offer evidence of statements or the conduct of your spouse or any other person which you contend was improper or questionable and should be considered by the court in making a determination of the disposition of any marital property of the parties, maintenance to you, or custody of any minor child(ren), please state:

- a. Describe in detail the exact nature of each incident, act, conduct, or series of actions constituting marital misconduct.
- b. The date, time and place of each incident, act, conduct, or series of actions constituting marital misconduct.
- c. The name(s), address(s), and telephone number(s) of each person who has personal knowledge of any fact, factor, information, evidence, circumstances, incident, situation, happening, or other allegation about any alleged marital misconduct in this case.
- d. How, why, and when it is asserted that the alleged marital misconduct adversely impacted upon the marriage, either or both parties, and/or the minor child(ren).
- e. Have you or anyone acting on your behalf ever hired, employed, or directed an entity, firm, or person(s) to watch, follow, spy upon, and/or report on the activities of your spouse?

ANSWER:

17. Identify any allegation, information regarding, or factual basis for belief that any child/children is being or has been physically, emotionally or mentally abused by either Party, step-parent, paternal or maternal grandparents, or any other person involved with the lives of the children, including, but not limited to:

- a. The approximate date(s) of each incident of abuse known;
- b. How you first became aware of allegations of abuse;

- c. Describe the facts surrounding each alleged abuse that you are aware of, which child/children it was perpetrated against and when, if known;
- d. Identify by name, address and telephone number the person(s) committing each incident of abuse;
- e. Did you ever report the incident to law enforcement authorities or to the Missouri Division of Family Services (DFS) and, if so, to whom; and, if not reported, why not?
- f. If publicly reported, was any action ever taken by DFS, law enforcement officials, or prosecuting attorney for the jurisdiction and, if so, please indicate what was done.

ANSWER:

18. State in full detail the reasons why you consider it to be in the best interest that the legal and/or physical custody of the minor child be placed with you.

ANSWER:

19. If you have any illness or chronic disability at this time, describe said chronic illness or disability in detail.

ANSWER:

20. If you are not presently employed full-time and have attempted to obtain full-time employment in the past six (6) months, state the names of all employers with whom you have consulted and the dates of all interviews or employment applications.

ANSWER:

21. If you are not presently employed full-time and have not attempted to obtain full-time employment in the last six (6) months, state the reason for not looking for full-time employment.

ANSWER:

22. State the name, address, occupation, place of employment and qualifications to give an opinion of each person you expect to call as an expert witness at trial. (If such information is available on the expert's curriculum vitae, such curriculum vitae may be attached to these interrogatory answers as a response to this question). Also, state the general nature of the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.

ANSWER:

Name of Attorney - Bar Number

Address
Attorney for Petitioner/Respondent

STATE OF MISSOURI)
) ss.
COUNTY OF _____)

The below-named person, being duly sworn upon his/her oath states that he/she has read the foregoing interrogatories and the answers given are true to the best of affiant's knowledge and belief.

Subscribed and sworn to before me this _____ day of _____,
_____.

My Commission Expires: _____

Notary Public